



## U.S. Department of Justice

United States Attorney  
Southern District of New York

The Silvio J. Mollo Building  
One Saint Andrew's Plaza  
New York, New York 10007

April 29, 2022

**BY ECF**

The Honorable Sidney H. Stein  
United States District Judge  
500 Pearl Street  
New York, New York 10007

**MEMO ENDORSED**

**Re: United States v. Mircea Constantinescu, Nikolaos Limberatos,  
Alin Hanes Calugaru, Florian Claudiu Martin, and Alexandru Radulescu,  
19 Cr. 651 (SHS)**

Dear Judge Stein:

On April 8, 2022, the Government submitted a letter proposing groupings of trial defendants "[i]n th[e] event" that "all five defendants cannot be tried during [one] trial." (Dkt. 1044). On April 18, 2022, the Court entered an order suggesting that the Government had proposed that "the trial proceed as two sequential trials." (Dkt. 1054). For avoidance of doubt, the Government respectfully writes to clarify that it is the Government's preference to try all five defendants in a single trial, if that is permitted. It is only if a five-defendant trial will *not* be permitted (*i.e.*, only if the defendants will need to be separated across more than one trial) that the Government respectfully requests that the Court group the defendants as proposed in the Government's April 8, 2022 letter.

Additionally, the Government and counsel for the defendants jointly and respectfully write to propose an agreed-upon schedule governing certain pretrial matters, which have not already been scheduled by the Court. The parties respectfully request that the Court adopt and "so order" the following proposed schedule, contingent on trial proceeding on June 21, 2022:

May 13, 2022:	Government expert disclosures and 404(b) notice due.
May 23, 2022:	Upon receipt of reasonable stipulations, Government produces Jencks Act material and <i>Giglio</i> material identified as of that date.
	Defense: produces any Rule 16.
May 27, 2022:	Government produces witness list and exhibits identified as of that date (with exhibits continuing to be produced on a rolling basis).
May 31, 2022:	Defense expert disclosures due.

May 13 2022  
In light of the adjournment  
of this trial until June 27,  
all below dates are  
adjourned by one week.  
So ordered.  
Sidney H. Stein  
USDS

June 3, 2022:

Defense produces witness list and Rule 26.2 materials.

Defense produces exhibits (identified as of that date), including both (a) any non-impeachment exhibits to be offered through Government witnesses or otherwise during the Government's case; and (b) any exhibits to be offered in the defense case.

Respectfully submitted,

DAMIAN WILLIAMS  
United States Attorney

By:                     /s/                      
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cc (by ECF): Meredith Stacy Heller, Esq. (counsel for Mircea Constantinescu)  
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Jill R. Shellow, Esq., Gary Kaufman, Esq. (counsel for Alin Hanes Calugaru)  
Edward Sapone, Esq. (counsel for Florian Claudiu Martin)  
James Branden, Esq. (counsel for Alexandru Radulescu)